REMARKS

Claims 1-31 and 33-34 are pending in the application. Claim 32 has been canceled. Claims 1, 14, 16, 24, 27, 28, 31, 33, and 34 have been amended. No new matter has been added. Entry of the amendment is respectfully requested. Reconsideration is respectfully requested.

Summary of Amendments to the Claims

The amendments to claims 14 and 16 are made to clarify which connection is being referenced and not by way of further limiting the scope of the invention. Claims 24 and 27 have been amended to provide that a stud supporting the locking bolt remains engaged within a narrow (or second) portion of an aperture when the locking bolt is selectively displaced between an extended position and a retracted position. Claim 31 has been amended to incorporate the subject matter of canceled claim 32. Claims 33 and 34 have been amended to depend from claim 31, as amended, rather than on canceled claim 32. The amendments to claims 33 and 34 do not change the scope of these claims as originally filed.

Summary of Amendments to the Specification

The amendments to the Specification at page 9 are made to correct minor typographic errors. The amendments at page 17 are made to provide consistent terminology with reference to the drive cam 40. No new matter has been added by way of the amendments to the Specification.

Claim Rejections

Claims 1-8, 10-18, 22 and 25 have been rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,089,168 to Dunlap et al.

Claim 31 has been rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 1,615,851 to Roth.

Claim 9 has been rejected under 35 U.S.C. § 103(a) as unpatentable over Dunlap et al.

Claims 19-21 have been rejected under 35 U.S.C. § 103(a) as unpatentable over Dunlap in view of U.S. Patent Application Publication No. 2003/0083661 to Orbay et al.

Claims 23, 24, and 27-29 have been rejected under 35 U.S.C. § 103(a) as unpatentable over Dunlap in view of either U.S. Patent No. 6,637,784 to Hauber et al. or U.S. Patent No. 5,120,094 to Eaton et al.

Claim 26 has been rejected under 35 U.S.C. § 103(a) as unpatentable over Dunlap in view of U.S. Patent No. 4,446,798 to Withington.

Claim 30 has been rejected under 35 U.S.C. § 103(a) as unpatentable over Dunlap in view of Roth.

Claims 32-34 have been rejected under 35 U.S.C. § 103(a) as unpatentable over Roth in view of U.S. Patent No. 3,426,707 to Heyl et al.

35 U.S.C. § 102 Rejections: The Applicable Legal Standards

Anticipation pursuant to 35 U.S.C. § 102 requires that a single prior art reference contain all the elements of the claimed invention arranged in the manner recited in the claim. *Connell v. Sears, Roebuck & Co.*, 722 F.2d 1542, 220 USPQ 193, 198 (Fed. Cir. 1983).

Anticipation under 35 U.S.C. § 102 requires in a single prior art disclosure, each and every element of the claimed invention arranged in a manner such that the reference would literally infringe the claims at issue if made later in time. *Lewmar Marine, Inc. v. Barient, Inc.*, 822 F.2d 744, 747, 3 USPQ 2d 1766, 1768 (Fed. Cir. 1987).

Anticipation is established only when a single prior art reference discloses, expressly or under principles of inherency, each and every element of a claimed invention. *RCA Corp. v. Applied Digital Data Sys., Inc.*, 730 F.2d 1440, 1444, 221 USPQ 385, 388 (Fed. Cir. 1984).

Anticipation by inherency requires that the Patent Office establish that persons skilled in the art would recognize that the missing element is necessarily present in the reference. To establish inherency the Office must prove through citation to prior art that the feature alleged to be inherent is "necessarily present" in a cited reference. Inherency may not be established based on probabilities or possibilities. It is plainly improper to reject a claim on the basis of 35 U.S.C. § 102 based merely on the possibility that a particular prior art disclosure could or might be used or operated in the manner recited in the claim. *In re Robertson*, 169 F.3d 743, 49 USPQ 2d 1949 (Fed. Cir. 1999).

Claims 1-8, 10-18, 22 and 25 Are Not Anticipated by Dunlap et al.

Claim 1

The Applicants respectfully submit that US Patent No. 6,089,168 to Dunlap et al. ("Dunlap") does not anticipate Applicants' claimed invention.

Dunlap does not disclose the claimed position of the drive cam

Claim 1 recites that the drive cam is mounted "adjacent to a first end of the locking bolt." However, Dunlap discloses a pair of spaced idler cams having an intermediate drive cam. It is the idler cams, not a drive cam, that are positioned adjacent the ends of the locking bolt. Therefore, Dunlap does not anticipate the claimed position of the drive cam.

Dunlap does not disclose a first bolt link operatively extending between the drive cam and the locking bolt

Claim 1 recites a cam link operatively extending between the drive cam and the idler cam; *a first bolt link operatively extending between the drive cam and the locking bolt*; a second bolt link operatively extending between the idler cam and the locking bolt; wherein rotational movement of the drive cam between a first position and a second position moves the locking bolt between the extended position and the retracted position, respectively. The exemplary embodiment of Figure 4, shows a drive cam (40), an idler cam (50), a cam link (52), a first bolt link (54), a second bolt link (56), and a locking bolt (60). Rotation of the drive cam (40) is directly operable to displace the first bolt link (54) which, in cooperation with displacement of the second bolt link (56), selectively moves the locking bolt (60) between extended and retracted positions.

Dunlap discloses and teaches a drive cam (122) and a pair of idler cams (118, 120). The drive cam is linked to each idler cam through long links (134, 136) to allow the idler cams to rotate in coordinated relation with the drive cam. Each idler cam is operably connected to locking bolt (102) by a short links (138, 140). (Col. 11, lines 26-37; Figs. 16-17). Where does the reference disclose the recited first bolt link? Where does the reference disclose a first bolt link extending between the drive cam and the locking bolt in the manner recited? As taught by

the reference, initial rotation of the drive cam (122) causes rotation of the idler cams (118, 120) via long links (134, 136). In Dunlap it is the rotation of the pair of idler cams (118, 120) that selectively moves the locking bolt (102) between extended and retracted positions via short links (138, 140). Dunlap does not disclose the claimed "*first bolt link operatively extending between the drive cam and the locking bolt*". It follows that Dunlap does not anticipate claim 1.

Claims 2-8, 10-18, 22, and 25

Claim 2-8, 10-18, 22, and 25 are dependent claims that each ultimately depend from claim 1. As such the comments directed to claim 1 above apply equally well to these claims and are incorporated herein by reference. Because it has been shown that Dunlap does not anticipate claim 1, claims directed to additional features or components in these dependent claims also cannot be anticipated by Dunlap.

Dunlap does not disclose a first connector which operably connects the drive cam and the first bolt link and the cam link

Additionally, claim 2 recites a first connector which operably connects the *drive cam* and the *first bolt link* and the *cam link*. The reference does not provide any such connector for the drive cam, a first bolt link, and the cam link. Figures 14-16 of Dunlap disclose connections between the drive cam (122) and the long links (134, 136). These Figures also disclose connections between the long links (134, 136) and the idler cams (120, 118), respectively. These Figures disclose further connections between the idler cams (120, 118) and short links (138, 140), respectively. However, the reference does not provide a first connector that connects a drive cam, a first bolt link, and a cam link.

Dunlap does not disclose a retainer, engaged with the drive cam, to retain the operative connection of the drive cam, the first bolt link, and the cam link

Also, claim 3 recites a retainer, *engaged with the drive cam*, which is operative to retain the operative connection of the drive cam and the first bolt link and the cam link. Nowhere in the reference is there a retainer, engaged with the drive cam, which performs the claimed operative connection.

Claim 4 provides the relative positioning of the first bolt link and the cam link with respect to the drive cam and the retainer. Claim 4 is not anticipated by the cited reference because Dunlap does not provide a connection of a drive cam and a first bolt link, nor does it provide a retainer engaged with the drive cam.

Claim 5 provides that the retainer is engaged with the drive cam *at a location disposed from the connection of the drive cam and the first bolt link and the cam link.* For example, note Applicants' Figures 7, 9, 22, and 29. No such retainer is disclosed in the cited reference, therefore the provision of an engagement site distinct from the connection site cannot be anticipated by the reference.

Claim 6 recites that *a portion of the retainer extends into a cut out in the drive cam.* Although the reference teaches a drive cam (122) with a cut out (146), the cut out is used to engage a selectively moveable lock bolt (128). (Col. 12, lines 29-35.) A portion of a retainer does not extend into the cut out, wherein the retainer is substantially prevented from rotating relative to the drive cam, as claimed in the instant invention.

Claim 7 depends from claim 5. Because the reference does not disclose the claimed retainer, or its relative position, the reference cannot teach that the retainer is operative to prevent disconnection of the removably connected drive cam and the first bolt link and the cam

link.

Claims 8 and 10-18 each include the limitation recited in claim 3. As such the comments directed to claim 3 above apply equally well to these claims and are incorporated herein by reference. Additionally, claim 10 recites that *the first bolt link is operatively engaged with the locking bolt and the engaged retainer is operative to prevent disengagement of the first bolt link and the locking bolt*. Because the claimed retainer is not disclosed in Dunlap, the arrangement of components as set forth in claim 10 cannot be anticipated by the reference.

Dunlap does not disclose a keeper, engaged with an idler cam, to retain the operative connection of the idler cam, the second bolt link, and the cam link

Claims 12-18 recite a keeper. In an exemplary embodiment a keeper (92) is engaged with an idler cam (50) which is operative to retain operative connection of the idler cam and a second bolt link (56) and a cam link (52). Dunlap does not provide any keeper which is operative to retain operative connection of the idler cam (120), long link (134), and short link (138) (e.g., Figure 17). Additionally, the claimed "cam link" (e.g., 52) is operatively connected to the drive cam (e.g., 40) and the first bolt link (e.g., 54) by retainer (e.g., 90) (e.g., claim 3) and operatively connected to the idler cam (e.g., 50) and the second bolt link (e.g., 56) by the keeper (e.g., 92) (e.g., claim 12). Dunlap does not disclose the claimed components or the claimed arrangement.

Claim 31 is not Anticipated by U.S. Patent No. 1,615,851 to Roth et al.

The Applicants hereby submit that claim 31, as amended, is not anticipated by U.S. Patent No. 1,615,851 to Roth et al. ("Roth").

Claim 31 has been amended to incorporate the subject matter of claim 32 as originally filed. As amended, claim 31 recites "the sleeve is operative to be substantially located on an opposite side of the door from the handle lever when in engagement with the handle shaft." As clearly illustrated in Figure 3 of Roth, sleeve (C) is positioned on the same side of the door as a handle lever (A). Furthermore, the Action is silent as to where Roth's handle shaft (G) has a tapered outer surface. Also, in Roth the "sleeve C is screwed upon the bushing D" (page 2, col. 1, lines 18-19). That is, the inner surface of sleeve (C) engages the bushing (D). Thus, it is unclear how the inner surface of sleeve (C) can engage the outer surface of handle shaft (G), especially to prevent removal of the handle shaft (G) through the door hole in a direction away from the handle lever (A). It follows that Roth does not anticipate claim 31.

35 U.S.C. §103 Rejections: The Applicable Legal Standards

The Office has the responsibility to present a *prima facie* case of obviousness under 35 U.S.C. § 103. An Applicant is entitled to a patent if the Office fails to establish a *prima facie* case of obviousness. *In re Oetiker*, 24 U.S.P.Q. 2d 1443 (Fed. Cir. 1992). In determining obviousness under 35 U.S.C. § 103, the invention must be considered "as a whole."

Any modification of the cited reference in order to arrive at Applicant's invention must be motivated by the cited art. *In re Deminski*, 230 U.S.P.Q. 313 (Fed. Cir. 1986). Applicant's own disclosure may not serve as a template to piece together the teachings of the prior art to

render the claimed invention obvious. *In re Fritch*, 23 U.S.P.Q. 2d 1780 (Fed. Cir. 1992). There must be a reason or suggestion in the prior art for selecting the claimed procedure, other than knowledge learned from Applicant's disclosure. *In re Dow Chemical*, 5 U.S.P.Q. 2d 1529 (Fed. Cir. 1988). The motivation for modifying a reference cannot be found if the reference actually "teaches away" from the claimed invention. *In re Gurley*, 31 U.S.P.Q. 2d 1130 (Fed. Cir. 1994). Further, in proposing a combination of references, it is improper to combine non-analogous prior art. *Oetiker*, 24 U.S.P.Q. 2d at 1446.

It is respectfully submitted that the 35 U.S.C. § 103 rejections set forth in the Action do not meet these burdens.

Claim 9 is not Obvious over Dunlap, et al.

The Applicants respectfully submit that US Patent No. 6,089,168 to Dunlap et al. ("Dunlap") does not teach or suggest Applicants' claimed invention.

Dunlap does not teach or suggest the claimed invention when taken as a whole

Claim 9 incorporates the limitations of claim 8, claim 3, claim 2, and ultimately claim 1. As such the comments directed to claims 8, 3, 2, and 1 above with reference to Dunlap are incorporated herein by reference. Even if it were somehow possible to replace Dunlap's screw with a dowel pin as alleged, Dunlap would still not teach or suggest the claimed invention when it is *taken as a whole*. Where does Dunlap teach or suggest a first bolt link extending between a drive cam and a locking bolt (claim 1)? Where does Dunlap teach or suggest a connector that operatively connects a drive cam, a first bolt link, and a cam link (claim 2)? Where does Dunlap teach or suggest a retainer, engaged with a drive cam, to retain an operative connection of a drive cam, a first bolt link, and a cam link (claim 3)? Where does Dunlap teach or suggest that the

first connector comprises a shaft wherein a drive cam, a first bolt link, and a cam link are rotatable on the shaft (claim 8/3/2/1)? With reference to Figure 16, Dunlap clearly teaches that drive cam (122) and L-link (134) are connected via a fastener. That same fastener is not engaged whatsoever with a first bolt link. The reference fails to provide the claimed invention when taken as a whole. Thus, the Office has not established a *prima facie* showing of obviousness.

Claims 19-21 are not Obvious Over Dunlap in View of Patent Publication 2003/0083661 to Orbay et al.

The Office may not combine references from non-analogous prior art

Patent publication 2003/0083661 to Orbay et al. ("Orbay")is not properly combinable with Dunlap because it is non-analogous art. A person of ordinary skill seeking to solve a problem of accurately aligning a drive cam with a lock bolt member in a secure enclosure of an automatic banking machine would not be reasonably expected or motivated to look to an intramedullary fixation device for long bone fractures. "The combination of elements from non-analogous sources, in a manner that reconstructs the applicant's invention only with the benefit of hindsight, is insufficient to present a *prima facie* case of obviousness." *Oetiker*, 24 USPQ 2d at 1446.

The proposed combination would destroy the teachings of the reference

Further, the references are not properly combinable because such a combination would destroy the teachings of the reference. In the fixation device of Orbay, the screws (28, 30) are engaged in screw holes (24, 26) in the nail portion (12). Tightening of the screws operates to pull the nail portion into a desired position. The bone to be treated is clamped between the screw heads and the device. Because the screws are engaged in threaded screw holes in the nail portion, the components remain in fixed relation. (See page 4, first column). It would destroy the teachings of Orbay to provide a screw that merely aligned the bone and the nail portion but did not engage screw holes to retain the components in a fixed relationship.

The proposed combination fails to meet all the limitations of the claimed invention

As noted above, the invention must be considered *as a whole* when determining obviousness under 35 U.S.C. § 103. With reference to the comments directed to claim 1 above, Dunlap does not provide each limitation set forth in Applicants' claims. Therefore, the Office's proposed combination of Orbay in combination with the teaching of Dunlap still does not provide Applicants' claimed invention. Thus, a *prima facie* case of obviousness is not established.

Claims 23, 24 and 27-29 are not Obvious Over Dunlap in View of either U.S. Patent No. 6,637,784 to Hauber et al. or U.S. Patent No. 5,120,094 to Eaton et al.

Applicants' respectfully submit that neither of the Office's proposed combinations provides Applicant's claimed invention. Thus, claims 23, 24, and 27-29 are not obvious over the cited art.

Claim 23

Dunlap fails to provide all the features of the base claim

Claim 23 is dependent on claim 1. Therefore the comments above directed to claim 1 with respect to the primary reference to Dunlap apply equally well to claim 23 and are incorporated herein by reference. The alleged addition of a locking boss (44) having an expanded head (56), as taught by Hauber, or the addition of a latch pin (52) having an enlarged head (64), as taught by Eaton, to the teachings of Dunlap (if somehow even possible) would still not meet all the features of Applicants' claimed invention.

Claim 24

Claim 24 depends from claim 23. As such, the comments directed to claim 23 above apply equally well to claim 24 and are incorporated herein by reference.

Neither of the proposed combinations provides the claimed operative engagement of a stud only within the narrow neck portion of a stud opening upon displacement of the locking bolt

Claim 24 has been amended in accordance with the Specification as originally filed to recite that "each stud is operable to engage only the narrower neck portion of one of the stud openings when the locking bolt moves between the extended position and the retracted position." For example, Applicants' Figure 4 shows the locking bolt in an extended position while Figure 5 shows the locking bolt in a retracted position.

Hauber teaches a slideable carrier (58) operable to shift latch pins (52), etc. between engaged and non-engaged conditions of the latch pins with the keyhole-shaped apertures (42), etc. formed in a keeper bar (92). (Column 5, lines 17-21, 31-42). It is imperative to the teachings of this reference that that enlarged heads (64) of the latch pins (52), etc. pass through the enlarged portions (423), etc. of the keyhole apertures in order to unlatch the door or window.

(Column 4, lines 43-61). In the claimed invention, the locking bolt is operable to move between extended and retracted positions. However, during displacement of the locking bolt, the studs remain engaged with only the narrow portions of the stud openings.

Eaton teaches a locking boss (44) having an expanded head (56). The sliding door arrangement includes panels (60, 62) having apertures (68, 70), respectively, therein. Aperture (70) includes a narrowed portion (72) and a widened portion (92). When the sliding door is in a locked position, aperture (70) is in registration with aperture (68) and the expanded head (56) of locking boss (44) is engaged by the narrowed portion (72) of aperture (70) to preclude withdrawal of the sliding door panel. (Column 5, lines 30-49). Eaton's Figure 4 illustrates a closed, but unlocked, position of the sliding door arrangement. The Figure illustrates that the locking boss (44) passes through the registered apertures (70, 68). (See Column 6, line 63-Column 7, line 4) It is imperative to the teachings of this reference that the expanded head (56) of locking boss (44) pass through the widened portion (92) of aperture (70) when the sliding door arrangement is in an unlocked condition. Thus, neither proposed combination provides the features of the claimed invention.

The Office's proposed modification of Hauber or Eaton destroys the teachings of the references

As shown above, a combination of Dunlap with either Hauber or Eaton (as alleged) fails to provide Applicants' claimed invention. Additionally, because any modification of Hauber or Eaton to limit the engagement of a latch pin or locking boss with only a narrowed portion of a key-hole shaped aperture would destroy the teachings of the references, such modification would not be obvious to one having ordinary skill in the art.

Claim 27

Claim 27 depends from claim 1. As such the comments directed to claim 1 as above apply equally well to claim 27 and are incorporated herein by reference. In addition, in a similar manner to claim 24, claim 27 has been amended to recite that "each stud is operable to engage only the second portion of one of the locking bolt openings when the locking bolt moves between the extended position and the retracted position . . ." Therefore the comments directed to claim 24 are applicable to claim 27 and are incorporated herein by reference.

The proposed combination(s) do not provide the claimed relative position of the drive cam

None of the references, singly or in combination, provide "a drive cam rotatably mounted in supporting connection with the door adjacent to a first end portion of the locking bolt" (claim 1). For instance, the drive cam of Dunlap is centrally disposed between first and second idler cams. Dunlap provides no teaching or suggestion to modify the positioning of the drive cam so that it is adjacent to a first end portion of the locking bolt.

The cited references do not provide Applicants' invention when taken as a whole

Claim 27 includes several features previously discussed as lacking in the primary reference to Dunlap. Where is the provision of a first bolt link operatively extending between the drive cam and the locking bolt (claim 1)? Where is a first retainer that is operative to prevent disconnection of the drive cam AND the first bolt link AND the cam link (claim 27)? Where is a second retainer that is operative to prevent disconnection of the idler cam AND the second bolt link AND the cam link (claim 27)? Neither of the secondary references can alleviate the deficiencies of Dunlap as they do not teach or suggest the recited features which are not found in Dunlap.

Further, claim 27 has been amended in accordance with the original disclosure to clarify

that the drive cam and the first bolt link and the cam link are removably connected at a first connection location, and the idler cam and the second bolt link and the cam link are removably connected at a second connection location. For example, note Applicants' Specification at page 17, lines 11-16; and Figure 7. Where do the references provide such a first connection location? Where do the references provide such a second connection location?

Additionally, claim 27 provides that each stud operably engages only the second portion of one of the locking bolt openings, a feature not shown, taught, or suggested in any of the references. Clearly, when claim 27 is taken *as a whole* the obviousness standard of 35 U.S.C. § 103 is not met.

Claim 28

Claim 28 depends from claim 27. As such the comments directed to claim 27 above apply equally well to claim 28 and are incorporated herein by reference.

Claim 29

Claim 29 depends from claim 27. As such, the comments directed to claim 27 above apply equally well to claim 29 and are incorporated herein by reference.

The references, singly or in combination, do not teach or suggest the claimed invention

Claim 29 provides that "the first bolt link extends into a first locking bolt hole and is operatively engaged with the locking bolt" and "the second bolt link extends into a second locking bolt hole and is operatively engaged with the locking bolt." Further, claim 29 recites that "the first retainer is operative to prevent disengagement of the first bolt link and the locking bolt" and "the second retainer is operative to prevent disengagement of the second bolt link and the locking bolt." Where do the references teach a first bolt link extending between a drive cam and a locking bolt (claim 1)? Where do the references teach a first bolt link that extends into a

hole in the locking bolt (claim 29)? Where do the references teach a first retainer operative to prevent disconnection of the drive cam and the first bolt link and the cam link (claim 27) AND prevent disengagement of the first bolt link and the locking bolt (claim 29)? Additionally, where do the references teach similar features with reference to a second bolt link, a second locking bolt hole, and a second retainer?

Because the claimed features addressed above, and others, are not taught or fairly suggested by the cited references, the Office has failed to present a *prima facie* case of obviousness.

Claim 26 is not Obvious Over Dunlap in View of U.S. Patent No 4,446,798 to Withington

Claim 26 depends from claim 1. As such, the comments directed to claim 1 above apply equally well to claim 26 and are incorporated herein by reference. Even if it were somehow possible to substitute into Dunlap the bent cam rod (40) of Withington as alleged, the substitution would still fail to produce the claimed features. Thus, when taken as a whole, the claimed invention is not obvious in view of the cited references.

Claim 30 Is Not Obvious Over Dunlap in View of Roth

Dunlap fails to provide all the features of the base claim

The comments above directed to claim 1 with respect to the primary reference to Dunlap apply equally well to claim 30 and are incorporated herein by reference. The addition of a door handle assembly, as taught by Roth, to the teachings of Dunlap (as the Office suggests) would still not meet all the features of Applicants' claimed invention. Applicants' remarks regarding claim 31 are also incorporated by reference herein.

Claims 33-34 are not obvious over Roth in view of Heyl

Claims 33 and 34 depend on claim 31. Claim 31 has been amended to incorporate the subject matter of canceled claim 32. Note Applicants' previous remarks regarding the patentability of claim 31. Additionally, there is no teaching or suggestion in Roth to provide a modification to reposition the sleeve (C) as alleged.

Heyl cannot alleviate the deficiencies of Roth as the reference does not teach or suggest the recited features which are not found in Roth. Neither of the references teach or suggest having a tapered sleeve substantially located on an opposite side of the door from a handle lever, especially when the tapered sleeve is in engagement with the handle shaft and prevents removal of the handle shaft through the door hole in a direction away from the handle lever. Where do the references teach or suggest tapered engagement of a sleeve and handle shaft on one side of a door that prevents removal of the handle shaft (through the door hole) from that side of the door? Therefore, claim 31 is not obvious over Roth in view of Heyl.

Claim 33

Regarding claim 33, there is no teaching or suggestion that Heyl's bushing (87) has a ledge in the manner recited, as alleged. Rather, the bushing (87) appears to be fixed to plate (47) by a weld. The Office has not established a *prima facie* showing of obviousness.

Claim 34

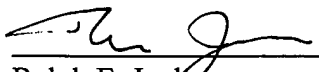
Regarding claim 34, the references do not teach or suggest a handle shaft having non tapered outer surface sections extending in the axial direction. Nor do the references teach or suggest a sleeve having non tapered inner surface sections extending in the axial direction, especially where the sleeve sections can correspond to the handle shaft sections to align the handle shaft. For example, note Applicants' Figures 35-38. The Office has not established a *prima facie* showing of obviousness.

Conclusion

Each of Applicant's pending claims specifically recite features and relationships that are neither disclosed nor suggested in any of the applied prior art. Furthermore, the applied prior art is devoid of any such teaching, suggestion, or motivation for modifying features of the applied art so as to produce Applicant's invention. Allowance of all of Applicant's pending claims is therefore respectfully requested.

The undersigned will be happy to discuss any aspect of the Application by telephone at the Office's convenience.

Respectfully submitted,



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